

Public Comment  
Recycled Water Policy  
Deadline: 12/22/08 by 12 noon

DIRECTORS:  
HARRY M. COWAN  
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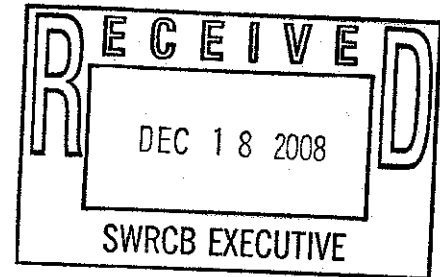
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December 18, 2008

Jeanine Townsend  
Clerk to the Board, Executive Office  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100



Re: Proposed Recycled Water Policy

Dear Ms. Townsend:

Regarding the proposed policy, please consider the following comments:

Line 297: This practice makes sense for precipitation events during the rainy season, but not for summer thunderstorms, which can start and stop without much warning. It will be very difficult, for example, for a golf course irrigating with recycled water at night on timers to shut down the irrigation system if a thunderstorm happens along.

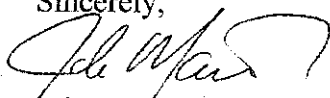
Lines 298-300: If the discharge of recycled water from a pond is an accidental event caused by an extraordinary storm, it is impractical to obtain prior approval from the Regional Board. The permit holder should simply be required to notify the Regional Board as soon as the accidental runoff is discovered.

Lines 329-332: It is presently unknown as to which CECs will be required to be monitored because the "blue ribbon" advisory panel has not been assembled. Therefore, it is impossible to estimate what financial burden this requirement will have on permit holders or recycled water irrigators. This cost has the potential to make the application of recycled water uneconomic compared to other available waters. I recommend that permit holders and recycled water irrigators be given five years to comply with recommendations that come from the "blue ribbon" panel.

Lines 352-354: Monitoring for nutrients should be periodic (preferably monthly) rather than continuous. The proposed policy does not specify.

Thank you for the opportunity to comment on this important issue.

Sincerely,

  
John Martin  
General Manager